

State Water Resources Control Board

October 24, 2017

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7015 1520 0001 7928 3225

Ms. Jennifer Davidson
Transportation Director
Round Valley Unified School District
P.O. Box 276
Covelo, California 95428
jdavidson@rvusd.us

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT ROUND VALLEY UNIFIED SCHOOL DISTRICT,
76270 HIGH SCHOOL STREET, COVELO**

Dear Ms. Davidson:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on October 18, 2017, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Maintain Operating Permit – The permit to operate was not available onsite at the time of inspection.	All	October 18, 2017	Ongoing	H&SC 25284(a)
2	Failure to Maintain Facility Information (A Form) – The facility information document was not available in CERS or onsite at the time of inspection.	All	October 18, 2017	Ongoing	23 CCR 2711(a)
3	Failure to Maintain Tank Information (B Form) – The tank information documents were not available in CERS or onsite at the time of inspection.	All	October 18, 2017	Ongoing	23 CCR 2711(a)
4	Failure to Provide Valid Board of Equalization (BOE) Number – The CERS submittal is incomplete without a valid BOE number.	All	October 18, 2017	Ongoing	H&SC 25286(c)(9)

Office of Enforcement | 801 K Street, Suite 2300 | Sacramento, CA 95814 | 916.341.5272

FELICIA MARCUS, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

No.	Violation	Tank	Start Date	Stop Date	Regulation
5	Failure to Notify Local Agency of Designated Operator (DO) – The written statement from the tank owner identifying the facility's DO was not available in CERS or onsite at the time of inspection.	All	October 18, 2017	Ongoing	23 CCR 2715(a)
6	Failure to Maintain Financial Responsibility – The Certificate of Financial Responsibility was not available in CERS or onsite at the time of inspection.	All	October 18, 2017	Ongoing	H&SC 25292.2; 23 CCR 2711(a)(11)
7	Failure to Maintain Monitoring Plan – The monitoring plan was not available in CERS or onsite at the time of inspection.	All	October 18, 2017	Ongoing	H&SC 25286(a); 23 CCR 2632(d)(1), 2711(a)(9)
8	Failure to Maintain Response Plan – The response plan was not available in CERS or onsite at the time of inspection.	All	October 18, 2017	Ongoing	23 CCR 2632(d)(2)
9	Failure to Maintain Site Map – The site map was not available in CERS or onsite at the time of inspection.	All	October 18, 2017	Ongoing	23 CCR 2711(a)(8)
10	Failure to Maintain Monitoring or Testing Records Onsite – The monitoring system certification from 2014 was not available onsite at the time of inspection. The cathodic protection testing documents from March 8, 2017, were not available onsite at the time of inspection.	All	October 18, 2017	Ongoing	H&SC 25293; 23 CCR 2712(b)
11	Failure to Perform Annual Spill Containment Testing – There were no records indicating that the spill containment testing is being conducted annually.	All	October 18, 2017	Ongoing	H&SC 25284.2
12	Failure to Perform Secondary Containment Testing – Piping for the boiler tank is not being tested every three years. There is no indication that this piping is safe suction and therefore the piping must be tested. The last secondary containment test was conducted on September 25, 2014 for all tanks, this test was due again on September 25, 2017 and has not been conducted.	All	October 18, 2017	Ongoing	23 CCR 2637(a)

No.	Violation	Tank	Start Date	Stop Date	Regulation
13	Failure to Maintain Spill Containment Requirements – The spill bucket was filled with sand preventing its ability to hold five gallons.	Boiler	October 18, 2017	Ongoing	23 CCR 2635(b)(1)
14	Failure to Provide DO Training – There was no DO employee training record onsite at the time of inspection	All	October 18, 2017	Ongoing	23 CCR 2715(f)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and Mendocino County Environmental Health within sixty (60) days from the date of this letter. Have your DO make specific notations in the next monthly DO report indicating the ongoing violations have been corrected. The monthly DO report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Ms. Rebecca Green
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
rebecca.green@waterboards.ca.gov

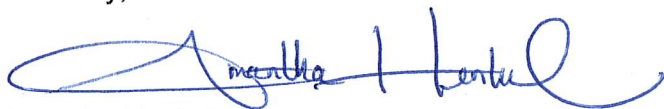
Local CUPA

Mr. Gary Leonard
Environmental Health Inspector
Mendocino County Environmental Health
860 North Bush Street
Ukiah, California 95482
leonardg@co.mendocino.ca.us

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: See next page.

cc: *(via email only)*

Mr. Mike Gonyea
Maintenance Personnel
Round Valley Unified School District
mgonyea@rvusd.us

Mr. Kirk Ford
Environmental Health Manager
Mendocino County Environmental Health
fordk@co.mendocino.ca.us

Mr. Gary Leonard
Environmental Health Inspector
Mendocino County Environmental Health
leonardg@co.mendocino.ca.us